

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

JOSE G. BROCE PINILLA,

Plaintiff,

v.

INTERNATIONAL UNION BANK,
LLC,

Defendant.

Case No.: 3:23cv01525 (RAM-
GLS)

RE: ***Collection of Money***
Breach of Contract
Damages
(Bench Trial)

URGENT MOTION IDENTIFYING NEW SOURCES OF IU BANK'S FUNDS
SUBJECT TO ORDER OF ATTACHMENT BY CONSENT

TO THE HONORABLE COURT:

NOW COMES, Plaintiff, José G. Broce Pinilla ("Mr. Broce" or "Plaintiff") by his undersigned attorneys, and very respectfully states and prays:

1. On December 8, 2023, the Honorable Court entered an Amended Order of Attachment by Consent, ordering the Clerk of the Court to issue an Amended Writ of Attachment in the amount of **\$529,602.81**, and identifying, among others, one hundred and forty-four (144) financial institutions, as well as other properties and assets of IU Bank, which could be in possession of moneys belonging to IU Bank, subject to attachment. **[Docket No. 48.]**

2. Since then, Plaintiff has become aware that two (2) other entities might be holding funds belonging to IU Bank,

which are subject to attachment per the Court's Order.

3. These two entities are:

a. **Easypay Finance ("Easypay")**, headquartered in 3220 Executive Rdg Ste 200 Vista, CA 92081-8572.

b. **Metropolitan Commercial Bank (Metropolitan")**, headquartered at 99 Park Avenue, 12th Floor New York, NY 10016.

4. Plaintiff certifies that the information provided is true and correct to the best of his knowledge and belief. Easypay is the platform used by IU Bank to make payments, and Metropolitan is the correspondent bank that IU Bank uses to receive and send transfer of funds.

5. For these reasons, Plaintiff requests that the Court and the Deputy Marshal take notice of the two (2) additional sources identified herein and carry out the attachment of any funds belonging to IU Bank that might be in the possession or custody of **Easypay Finance** and **Metropolitan Commercial Bank**.

WHEREFORE José G. Broce Pinilla respectfully requests that the Court and the Deputy Marshal take notice of the foregoing and execute the Amended Writ of Attachment upon money or assets of IU Bank in **Easypay Finance** and **Metropolitan Commercial Bank**.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on December 12, 2023.

WE HEREBY CERTIFY that, on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

/s/Ramón Coto-Ojeda

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